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MEMO ENDORSED

July 11, 2019

Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

Via Electronic Filing

Re: Vertime v. New Dover Group Ltd. 7:17-cv-03844(KMK)

Dear Judge Karas:

This firm represents Chaim Fischer and his companies. I write to notify the Court that Defendant, New Dover Group has filed for bankruptcy protection under Chapter 11 of the bankruptcy code under Case No. 19-23266. As the Court is aware, Plaintiff's motion for contempt and sanctions is pending and my clients' opposition is due tomorrow, July 12, 2019. We believe that this action and the pending motion are subject to the automatic stay of 11 U.S.C. § 362(a)(1) and (6) as the plain language of the statute prohibits the continuation of this action. While my client is prepared to file its opposition, I request the Court's guidance in order to avoid any inadvertent violation of the automatic stay while still protecting my clients' interests in this proceeding. As this is a time sensitive matter, I am available for a phone conference at any time today or tomorrow.

The case is stayed unless and until the Bankruptcy court resolves the Chapter 11 filing or rules otherwise.

Very truly yours,

Avram E. Frisch

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Cc: Chaim Fischer (via email)
Todd Michaelis (via ECF)
Jonathan Ross (via ECF)

So good -
RJM

7/11/19